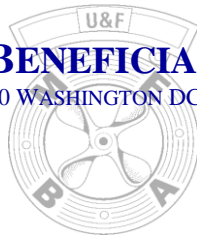


MARINE ENGINEERS' BENEFICIAL ASSOCIATION (AFL-CIO)

444 NORTH CAPITOL STREET, NW, SUITE 800 WASHINGTON DC 20001 PH: (202) 638-5355 FAX: (202) 638-5369

DON KEEFE
PRESIDENT



BILL VAN LOO
SECRETARY-TREASURER

April 27, 2009

Denise M. Boucher
Director of the Office of Policy, Reports, Disclosure
Office of Labor-Management Standards
Department of Labor
200 Constitution Ave. N.W., Room N-5609
Washington, DC 20210

Comment on Proposed Rule Change Labor Organization Annual Financial Reports RIN: 1215-AB62

In the Federal Register of April 21, the Department solicited comments on a Noticed of Proposed Rulemaking (NPRM) proposing rescission of the Department's Final Rule published in January 21, 2009. The primary reasons the Department noted for the proposed rescission included (1) a lack empirical data on the benefits or effectiveness of the 2003 increased financial reporting burden and (2) inaccurate calculation of the additional burden imposed by the proposed rule. On behalf of the over 5000 members of national Marine Engineers Beneficial Association (MEBA), we urge the Department to rescind the Final Rule until the Department can accurately assess both the benefits and burdens of the 2003 rule.

When calculating the increased burden imposed by both the 2003 Rule and the 2009 Rule, it is important that the Department conduct its feasibility calculations using not only the correct number of additional hours each Rule imposes, but the an accurate cost associated with those hours. The MEBA, like many large and national unions, utilizes external accountants to verify its internal bookkeeping and prepare for the annual financial reports. Use of outside personnel greatly increases our union leadership's accountability to the membership while creating an extra layer of protection against possible reporting mistakes. The cost of such outside consultants greatly exceeds the cost of internal accounting. Indeed, the cost to a client of obtaining the services of such an accountant significantly exceeds that accountant's own hourly wage. If and when the Department conducts an accurate cost benefit analysis, the MEBA urges it to use more accurate hourly figures that reflect this reality.

Finally, the MEBA wishes to renew a comment the MEBA made when the Department originally solicited comments in July, 2008. If the Department desires truly effective financial disclosures without overly burdening the regulated entities, it should release and utilize a standardized computer based accounting system for mandatory use by all large unions. Such a system would have the benefit of permitting unions and accountants to develop expertise that transcended organizations. In addition, a standardized system

would ensure that similar expenses and receipts from different unions were reported in the same categories leading to the most useable data being released to union members. For the foregoing reasons, the MEBA requests the rule is rescinded pending further study.

Sincerely,

Nils Djusberg
MEBA Legal Counsel

Adam Bellotti
Legal Assistant